



HIGH SCHOOL COHORT GRADUATION RATE

FREQUENTLY ASKED QUESTIONS

IDAHO STATE DEPARTMENT OF EDUCATION

The information in this FAQ document is taken from the federal non-regulatory guidance, *High School Graduation Rate*. Where needed, additional information is provided which directly pertains to Idaho in relation to Idaho's Elementary and Secondary Education Act (ESEA) waiver. This information is presented in a bold and italicized font for easy reference.

For additional information on the federal non-regulatory guidance document, please visit <http://www.ed.gov/news/press-releases/states-report-new-high-school-graduation-rates-using-more-accurate-common-measur>

For additional information on Idaho's ESEA Waiver, please visit <http://www.sde.idaho.gov/site/esea/>.

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Introduction – Federal Guidance

Establishing a uniform and accurate measure of the high school graduation rate that is comparable across States is a critical step toward improving high school accountability. An adjusted cohort graduation rate will improve our understanding of the characteristics of the population of students who do not earn regular high school diplomas or who take longer than four years to graduate. Numerous reports and statistics from the U.S. Department of Labor indicate the importance of a high school diploma. For example, in 2006, the unemployment rate for high school dropouts aged 25 and older was more than 1.5 times the rate of individuals who had a high school diploma (6.8 percent compared to 4.3 percent, respectively). Data for the same year also show that median annual earnings for high school graduates were \$29,000, or nearly 32 percent higher than the \$22,000 earned by those who did not receive a high school diploma.¹ These data make very clear the high economic costs of not completing high school.

In August 2004, the National Center for Education Statistics (NCES) released a report synthesizing the recommendations of a panel of experts on graduation rate calculations. The panel recommended an adjusted cohort graduation rate as the best method for calculating the graduation rate.² In 2005, the National Governors Association (NGA) Task Force on High School Graduation Rate Data published its report. The lead recommendation was for all States to adopt and begin immediately taking steps to implement a standard four-year adjusted cohort graduation rate consistent with that proposed by the NCES panel.³

On October 29, 2008, the Department published final regulations amending the existing regulations implementing Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB).⁴ The amendments included changes to 34 C.F.R. §200.19, regarding the “other academic indicators” that States use in defining “adequate yearly progress” (AYP). Those amendments to 34 C.F.R. §200.19 included new requirements for calculating graduation rate, which is the other academic indicator for high school. Throughout this guidance, these final regulations are referred to as the “2008 Title I regulations.”

The 2008 Title I regulations require States and local educational agencies (LEAs) to report on their annual report cards a four-year adjusted cohort graduation rate, disaggregated by subgroups, at the school, LEA, and State levels, respectively. This requirement is to be implemented beginning with the report cards, required by section 1111(h) of ESEA, that include information from State assessments administered during the 2010-2011 school year. Further, States must use that rate, disaggregated by subgroups, in making AYP determinations for schools, LEAs, and the State beginning with the determinations that are based on 2011-2012 assessment results.⁵ Prior to the 2010-2011 deadline, the regulations permit States to use a transitional graduation rate. In addition to calculating the four-year graduation rate, a State may apply to the Department for approval to use an extended-year adjusted cohort graduation rate as part of its AYP calculations. The 2008 Title I regulations also require each State to set a goal and targets for high school graduation and to incorporate the goal and targets into its AYP definition, beginning in 2009-2010.

This non-regulatory guidance provides States, LEAs, and schools with information about how to implement the provisions in 34 C.F.R. §200.19(b). Section A of this guidance defines the four-year adjusted cohort graduation rate, the extended-year adjusted cohort graduation rate, and the transitional graduation rates that are allowable until States must implement the four-year adjusted cohort graduation rate. Section B guides States in setting a single graduation rate goal and annual graduation rate targets. Section C outlines requirements for reporting graduation rate. Section D answers questions about how States include the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate in AYP determinations, including the use of disaggregated rates for student subgroups. Section E provides information about how a State must revise its Consolidated State Application Accountability Workbook (Accountability Workbook) to include certain information and submit its revisions to the Department for technical assistance and peer-review. Section F clarifies the timeline for implementing the new graduation rate provisions, as well as the process for how a State that cannot meet the deadlines outlined in the final regulations may request, from the Secretary, an extension of time to meet the requirements.

¹U.S. Department of Education. (2008). Condition of Education 2008. Washington, DC: Author

²National Institute of Statistical Sciences and Education Statistics Services Institute. (2004). [National Institute of Statistical Sciences/Education Statistics Services Institute Task Force on Graduation, Completion, and Dropout Indicators](#) (NCES 2005-105). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

³National Governors Association. (2005). [Graduation Counts: A Report of the National Governors Association Task Force on High School Graduation Rate Data](#). Washington, DC: Author.

⁴<http://www.ed.gov/legislation/FedRegister/finrule/2008-4/102908a.html>

⁵In order for a school or LEA to make AYP, it must meet or exceed the State's other academic indicator(s) (in addition to meeting proficiency and assessment participation goals). Each State must use graduation rate as its other academic indicator at the high school level. (Section 1111(b)(2)(C)(vi) and 34 C.F.R. §200.19

Section 1: Four-Year Adjusted Cohort graduation Rate Definition

What is a “four-year adjusted cohort graduation rate”?

As defined in 34 C.F.R. §200.19(b)(1)(i)-(iv), the four-year adjusted cohort graduation rate (hereafter referred to as “the four-year graduation rate”) is the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for the graduating class. From the beginning of 9th grade, students who are entering that grade for the first time form a cohort that is subsequently “adjusted” by adding any students who transfer into the cohort later during the 9th grade and the next three years and subtracting any students who transfer out, emigrate to another country, or die during that same period.

How is the adjusted four-year cohort graduation rate calculated?

The four-year graduation rate is calculated by dividing the number of students who graduate in four years or less with a regular high school diploma by the number of students who form the adjusted cohort for that graduating class.

The following formula provides an example of the four-year graduation rate for the cohort entering 9th grade for the first time in the fall of the 2008-2009 school year and graduating by the end of the 2011-2012 school year.

Number of cohort members who earned a regular high school diploma by the end of the 2011-2012 school year

Number of first-time 9th graders in fall 2008 (starting cohort) plus students who transfer in, minus students who transfer out, emigrate, or die during school years 2008-2009, 2009-2010, 2010-2011, and 2011-2012

May the four-year graduation rate include students who graduate in the summer after their fourth year of high school?

A State may, but is not required to, include students who graduate in the summer after their fourth year of high school among the cohort members who graduate in four years. However, the inclusion of such students in the four-year graduation rate may not delay annual AYP determinations. In order not to delay those determinations, a State that includes summer school graduates typically “lags” graduation rates for AYP determinations. For example, such a State would announce AYP determinations for the 2011-2012 school year prior to the start of the 2012-2013 school year using assessment results from the 2011-2012 school year and the graduation rate from the 2010-2011 school year (which includes students who graduated in summer 2011). Lagging graduation rate in this manner may provide a State with a more complete picture of the on-time graduation rate, while also allowing additional time to review and ensure the accuracy of graduation rate data without delaying annual AYP determinations.

How is Idaho calculating the 2013-2014 school year adjusted four-year cohort graduation rate?

Idaho is including summer graduates and uses the following formula to calculate the 2013-2014 school year adjusted cohort graduation rate for the cohort entering 9th grade for the first time in the fall of the 2010-2011 school year and graduating through summer 2014.

Number of cohort members who earned a regular high school diploma *through summer 2014*

Number of first-time 9th graders in fall **2010** (starting cohort) plus students who transfer in, minus students who transfer out, emigrate, or die during school years **2010-2011, 2011-2012, 2012-2013, 2013-2014 and through summer 2014**

With district and school accountability in a holding pattern for the 2013-2014 school year, the adjusted cohort graduation rate for the 2013-2014 school year only, for Idaho districts and schools, will include those seniors who graduated the summer after their senior year. For the 2014-2015 school year adjusted cohort graduation rate calculation and beyond, future Idaho Accountability Committee decisions will determine how an adjusted/extended graduation rate may be utilized to account for those students who graduate the summer after their senior year.

How was Idaho's graduation rate calculated for the 2012-13 school year? How is it different from the adjusted cohort graduation rate?

The graduation rate for SY 2012-13, for Idaho schools and districts, was calculated by taking the four-year completion rate for state (or district) "s" at year "t." In other words, the number of graduates for the current school year (t), divided by the number of number of high school completers at year "t", plus grade 12 dropouts for year "t", plus the number of grade 11 dropouts at year "t-1", plus the number of grade 10 dropouts at year "t-2", and the number of grade 9 dropouts at year "t-3"; see equation below.

$$G = c_{st}^{long} = \frac{g_{st}}{g_{st} + d_{st}^{12} + d_{s(t-1)}^{11} + d_{s(t-2)}^{10} + d_{s(t-3)}^9}$$

Where

- G = graduation rate.
- c_{st}^{long} = four-year completion rate for state s at year t.
- g_{st} = number of high school completers at year t.
- d_{st}^{12} = number of grade 12 dropouts at year t.
- $d_{s(t-1)}^{11}$ = number of grade 11 dropouts at year t-1.
- $d_{s(t-2)}^{10}$ = number of grade 10 dropouts at year t-2.
- $d_{s(t-3)}^9$ = number of grade 9 dropouts at year t-3.

Please be aware that historical district and/or school graduation rates cannot be compared for the following reasons:

- ***A drastic change in calculation from the old equation to the adjusted cohort graduation rate. With this change, students who graduate with a GED now count as a non-graduate in their cohort, as well as, students who graduate at a date beyond their cohort. Move to Section 2 of this document for additional information in regards to which students can be removed from a cohort, beginning the 2013-14 school year.***
- ***A gradual increase in required documentation to prove that a student was either a transfer, emigrant, or deceased.***

Why must States base the four-year graduation rate on "first-time in 9th grade" cohorts?

Cohort-based graduation rates are accurate only if each student is assigned to a single cohort. For example, without a single cohort assignment, a student who repeated 9th grade might be included in two separate cohorts of 9th graders—the class in which the student originally started 9th grade and the class in which the student was assigned for his or her second year of 9th grade. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student would not graduate within four years of starting 9th grade. Therefore, to ensure an accurate measure of a four-year graduation rate, the cohort must be based only on students who are first-time 9th graders.

The initial enrollment entry date and grade level in the Idaho System are used to put a student in a specific cohort. For example, the 2013-14 school year's "first-time in 9th grade" cohort would only include those high school students who were initially enrolled in the State of Idaho as follows:

- ***09th graders in 2010-2011 school year***
- ***10th graders in 2011-2012 school year***
- ***11th graders in 2012-2013 school year***
- ***12th graders in 2013-2014 school year***

Does the four-year graduation rate include a student who graduates from high school in less than four years?

Yes. The four-year graduation rate counts a student who graduates with a regular high school diploma in four years or less as a high school graduate in his or her original cohort—that is, the cohort with which he or she started 9th grade. For example, a student who enters the 9th grade for the first time in the **2011-2012** school year and graduates in three years would be included in the cohort of students expected to graduate in the **2014-2015** school year, even though that student would receive his or her diploma in the **2013-2014** school year. The student may be included only

in the graduation rate calculated for the cohort of students who started 9th grade in **2011-2012**, effectively, the student's graduation information is "banked" for a year until his or her cohort graduates in **2014-2015**. Thus, the numerator in the graduation rate calculation includes only members of the cohort that graduate in a particular year, not other students who may also graduate that year.

Be sure to keep students who are part of an advanced opportunity program (i.e. 8 in 6 program, Early Completers, Fast Forward, etc.) coded in their age-appropriate grade level. This will ensure these students will remain in their cohort even if they graduate early. If a student were to decide that he/she no longer wants to participate in an advanced opportunity program, and is no longer in his/her age-appropriate grade level, he/she may be counted as a non-graduate in a different cohort.

If a student changes subgroup membership by the end of high school, how would that student be counted in the four-year graduation rate?

In some cases, a student who is part of one subgroup as a 9th grader may no longer be part of that subgroup as a 12th grader (e.g., a student might be LEP upon entering high school, but designated proficient in English by the end of high school). States are responsible for developing clear and consistent rules for how to count such students in the four-year graduation rate. Some States count students in the subgroups in which they were members in 9th grade, while others count students in the subgroups in which they were members in 12th grade.

For every category except race/ethnicity, the student is included in a subgroup if they were ever in that subgroup during the 4 years of their cohort period. For race/ethnicity, the value at the end of the cohort period, or the last known value if they did not continue in Idaho public schools to the end of the cohort period is used as a student's race/ethnicity for graduation rate reporting purposes.

How is a student who graduates in more than four years counted in the four-year graduation rate?

A student who graduates in more than four years is counted as a non-graduate in the four-year graduation rate. Such a student must be included in the denominator of the four-year graduation rate and may not be included in the numerator because the student did not graduate in four years or less with a regular high school diploma. The student may not be removed from the cohort or assigned to a different cohort when calculating the four-year graduation rate. However, such a student may be counted as a graduate in an extended-year graduation rate in a State that chooses to use such a graduation rate. ***Please see pages 5 for more information on Extended Graduation Rate.***

How is a student with a disability who has an individualized education program (IEP) that includes a plan to complete graduation requirements in more than four years included in the four-year graduation rate?

Only students who graduate with a regular high school diploma in four years or less may be included in the numerator of the four-year graduation rate. Thus, a student who takes more than four years to graduate, regardless of the reason, must be included in the adjusted cohort for the four-year graduation rate (the denominator) but may not be counted as a graduate (the numerator) when calculating the four-year graduation rate. However, a student with a disability who graduates with a regular high school diploma in more than four years may be included in an extended-year graduation rate in a State that chooses to use such a graduation rate. ***Please see below for more information on Extended Graduation Rate.***

A student with a disability who does not graduate with a regular high school diploma, but instead receives an alternative diploma, certificate of completion, or any other degree or certificate that is not fully aligned with a State's academic content standards may not be counted as graduating in calculating either the four-year or extended-year graduation rate.

Idaho does not use alternative diplomas or certificates of completion but issues regular high school diplomas through an IEP based on completion of adapted graduation requirements. If a regular high school diploma is granted for completing requirements that are not comparable to regular graduation requirements, the student is counted as a non-graduate in his/her cohort. Please see page 10 for more information on Regular High School Diploma.

May a State include students who graduate in more than four years with a regular high school diploma in graduation rate calculations?

Yes. A State may use an “extended-year adjusted cohort graduation rate” (hereafter referred to as the “extended-year graduation rate” ***as long as it is approved through Idaho’s ESEA waiver.*** . The option to use an extended-year adjusted cohort graduation rate allows a State to give schools and LEAs credit for successfully grading students who take longer than four years to graduate high school with a regular high school diploma. A State may not have an extended-year graduation rate to account only for students in particular subgroups (e.g., only a five-year graduation rate for students with disabilities).

While the regulations do not limit the number of years a State may include in an extended-year graduation rate, a State requesting an extended-year rate of more than five years should justify, and support with data, why such an extended-year rate is needed.

What is an extended-year adjusted cohort graduation rate?

An extended-year adjusted cohort graduation rate is defined as the number of students who graduate in four years or more with a regular high school diploma divided by the number of students who form the adjusted cohort for the four-year graduation rate, provided that the adjustments add to the cohort all students who transfer into the cohort by the end of the year of graduation being considered and subtract students who transfer out, emigrate to another country, or are deceased by the end of that year (34 C.F.R. §200.19(b)(1)(v)). An extended-year graduation rate follows the same rules as the four-year graduation rate.

Future Accountability Committee decisions will determine how an extended graduation rate may be utilized to account for those students who graduate the summer after their senior year, and for those students who are on an extended graduation plan.

Section 2: Adjusting a Cohort

How is a cohort “adjusted”?

The four-year graduation rate follows a cohort, or a group of students, who begin as first-time 9th graders in a particular school year and who graduate with a regular high school diploma in four years or less. An extended-year graduation rate follows the same cohort of students for an additional year or years. The cohort is “adjusted” by adding any students transferring into the cohort and by subtracting any students who transfer out, emigrate to another country, or die during the years covered by the rate.

Which students may be “removed from a cohort”?

Only a student who transfers out and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma, emigrates to another country, or dies may be removed from a high school’s or LEA’s cohort.

Removing a student from his/her cohort means removing the student from the denominator of the graduation rate equation. Before removing a student from a cohort, a school or LEA must obtain confirmation in writing that the student transferred out, emigrated, or is deceased. No other students may be removed from the cohort. Thus, schools and LEAs must ensure that a student who drops out of high school is not deemed a transfer for purposes of calculating graduation rate; rather, the student must remain in the adjusted cohort— that is, the denominator of the graduation rate calculation. The 2008 Title I regulations do not require a State to track and report on the dropout rate, although data on drop outs is collected by the Department of Education independently of these requirements.

What is the definition of a “transfer”?

A transfer into a cohort occurs when a student enrolls after the beginning of the entering cohort’s first year in high school, up to and including in grade 12. A transfer out of a cohort occurs when a student leaves a school and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma. **A student who is retained in grade, enrolls in a GED program, or leaves school for any other reason may not be counted in the four-year or extended-year graduation rate as a transfer and must remain in the adjusted cohort (i.e., must be included in the denominator of the graduation rate for that cohort) (34 C.F.R. §200.19(b)(1)(ii)(B) (2)).**

If a student is dual enrolled, which school or LEA’s cohort should the student be assigned to?

If a student is dual enrolled, the system currently determines the home/base school based on their latest exit date and enrollment record. For example, if a dual-enrolled student receives a regular high school diploma from School A on May 15, 2014, but School B also graduates the student with a regular high school diploma on June 30, 2014, School B’s exit record supersedes School A’s exit record. And the student will count as a graduate for School B.

Please be sure that the exit date from the home/base school is a later date than that of the dual-enrolled school, i.e. virtual or technical school.

If a student who has repeated a grade transfers into a school, should the student be assigned to the cohort in which the student started 9th grade for the first time?

Yes. This assignment prevents the student from being included in two separate cohorts of 9th graders—the cohort in which the student originally started 9th grade and the cohort in which the student was assigned in the school to which he or she transferred. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting 9th grade.

If a student re-enrolls in a public high school after having dropped out of school for a period of time, how may a school or LEA count that student in the four-year or extended-year graduation rate?

The adjusted cohort graduation rate requires a State to have in place an accurate student record system that can track the progress of individual students over time. This system must record when a student has dropped out of

school (and may not count him or her as a student who has transferred out). If, for example, a student who was a first-time 9th grader in **2010-2011** drops out in **2011-2012** after tenth grade, and then re-enrolls in high school in **2012-2013**, that student may be deemed to have transferred into the receiving school **and should be assigned to the cohort in which the student was a member when he or she started 9th grade for the first time (2010-2011)**. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting 9th grade, and therefore would count as a non-graduate in the four-year graduation rate. However, if the student graduates in more than four years, he or she may be counted as a graduate, in an extended-year graduation rate, if the State chooses to use one. As long as the student re-enrolls before the State determines the four-year graduation rate for that student's cohort, the student would no longer be recorded as a drop out and the student record system should be adjusted accordingly.

May a school or LEA consider a student to be a transfer if the student leaves a public high school and enrolls in a private school?

Yes. If a student leaves a public high school to enroll in a private school, that student would be considered to be a transfer out under 34 C.F.R. §200.19(b)(1)(ii)(B)(1).

May a school or LEA consider a student to be a transfer if the student leaves a public high school to be home schooled?

Yes. A student who leaves a public high school to be home schooled would be considered to be a transfer.

May a school or LEA consider a student to be a transfer if the student leaves a public high school and enrolls in another educational program?

A student who leaves a public high school and enrolls in another educational program may be considered a transfer **only if that educational program potentially culminates in the award of a regular high school diploma**. For instance, if a student leaves a public high school because the student is placed in a juvenile detention center, the student would be a transfer if the center provides and the student participates in an educational program that culminates in the award of a regular high school diploma (as defined in 34 C.F.R. §200.19(b)(1)(iv)). Otherwise, the student may not be considered a transfer and must remain in the adjusted cohort for purposes of calculating the four-year and extended-year graduation rate.

Why is written confirmation required before a student may be removed from a cohort?

It is critical for a school or LEA to have written confirmation that a student has transferred, emigrated to another country, or died before a student is removed from a cohort. Written documentation facilitates audits and, thus, will help ensure that States, LEAs, and schools have an accurate measure of graduation rate. Often LEAs and States have classified as a transfer a student who leaves a school for any reason, even if the student does not enroll in another school or in an educational program that culminates in the award of a regular high school diploma. Unless a school or LEA can confirm in writing that a student has transferred out, emigrated to another country, or is deceased, the school or LEA must consider that student to be in the adjusted cohort for purposes of calculating the four-year or extended-year graduation rate.

What documentation is required to confirm that a student has transferred out--i.e., transferred to another school or to an educational program that culminates in the award of a regular high school diploma?

To confirm that a student transferred out, a school or LEA must have "official written documentation" that a student has transferred to another school or to an educational program that culminates in the award of a regular high school diploma (34 C.F.R. §200.19(b)(1)(ii)(B)(1)). In the case of a student who moves to another public school within the State, that transfer would most likely be officially documented and recorded in the State's data system; thus, a record from the State's data system would be considered official written documentation. Other examples of official written documentation include: a request for student records from a receiving public or private high school or an educational program (that culminates in a regular high school diploma); or a written record of a response from an official in the receiving school or program acknowledging the student's enrollment. With respect to a home schooled student, official written documentation may include, for example, a letter of withdrawal or other written confirmation from the parent or guardian; any documentation that meets the home school notification or compulsory attendance

requirements in the State; or any other written documentation accepted in the State to verify a child is home schooled. A conversation with a parent or neighbor of a student, for instance, would not be considered official written documentation of a transfer.

Within District Transfer and Transfer Within State Different District must be verified within the state database. If a receiving district does not upload the student through their monthly ISEE upload under his/her existing EDUID, the student will count as a non-graduate for the transferring school, unless the school can provide a request for records or a letter from the receiving school.

What documentation is required to confirm that a student has emigrated to another country?

A school or LEA must have written confirmation that a student has emigrated to another country (34 C.F.R. §200.19(b)(1)(ii)(B)), but need not obtain official written documentation. For example, if a parent informs a school administrator that the family is leaving the country, the school administrator may document this conversation in writing and include it in the student's file. The regulations do not require written documentation to be "official" for a student who emigrates to another country because the Department recognizes that it may be difficult, if not impossible, to obtain transcripts or other official documentation from another country confirming that the student is enrolled in school.

What documentation is required to confirm that a student is deceased?

A school or LEA must have written confirmation that a student is deceased before removing the student from the cohort (34 C.F.R. §200.19(b)(1)(ii)(B)). A letter from a parent or an obituary is sufficient documentation. Official written documentation of a student's death, such as a death certificate, is not necessary.

How can an LEA document the transfer of a migrant student?

The Department's Migrant Student Information Exchange system includes information on migrant students that can be accessed by all States and LEAs to help ensure that the academic records of these highly mobile students are preserved during their frequent moves. This system should be of great assistance to States in documenting the enrollment of migratory students, as defined in section 1309 of the ESEA, in another school or in an educational program that culminates in the award of a regular high school diploma.

For additional information on the Migrant Student Information Exchange, please visit <http://www2.ed.gov/admins/lead/account/recordstransfer.html>.

Is a student who leaves school because the student is incarcerated considered a transfer?

An incarcerated student may be considered a transfer only if the prison or juvenile facility to which the student is confined has a school (as defined under State law) or provides an educational program that culminates in the award of a regular high school diploma. If the facility does not have a school or educational program, or provides an educational program that does not culminate in the award of a regular high school diploma, the student may not be considered a transfer, may not be removed from the cohort, and must remain in the denominator of the graduation rate calculation for the school, LEA, and State in which the student last attended high school.

If, after multiple attempts, an LEA cannot obtain official written documentation that a student has transferred out, may the LEA remove the student from the cohort?

No. Although in some cases it may be difficult for an LEA to obtain official written documentation of a student's transfer, the student may not be removed from the cohort simply because the student's status cannot be documented. Removing a student from the cohort whose status cannot be documented could produce an inaccurate graduation rate if that student dropped out of school rather than transferred. It is critical that an LEA carefully document student transfers and accurately calculate the four-year graduation rate in order to (a) give parents and the public accurate information about the success of a school, LEA, and State in graduating students and (b) ensure that AYP determinations are based on valid graduation rate calculations. States should establish clear and consistent business rules and data checks to safeguard against incorrect coding of students who leave a school or LEA.

For a current list of exit codes/reasons, please see the ISEE Required Data Collection Elements, at <http://www.sde.idaho.gov/site/isee/requiredData.htm>.

Because the Idaho State Dept. of Education understands that it is difficult for districts/schools to keep track of documentation, the Idaho State Department of Education IT staff is working on a daily graduation appeals site, where districts can upload the needed documentation at the time a student transfers, emigrates, or dies. This application will be ready in the near future.

Section 3: Regular High School Diploma

How is a “regular high school diploma” defined?

Under 34 C.F.R. §200.19(b)(1)(iv), a “regular high school diploma” means the standard high school diploma awarded to students in a State that is fully aligned with the State’s academic content standards **and does not include a GED credential, certificate of attendance, or any alternative award**. The term “regular high school diploma” also includes a “higher diploma” that is awarded to students who complete requirements above and beyond what is required for a regular diploma

REMINDER: Only those students who graduate as a regular graduate or alternate route – regular graduate (fully aligned with Idaho’s academic content standards) count towards the cohort graduation rate. Students who graduate with a regular high school diploma through an IEP are NOT included in the numerator but will remain in the denominator. If they receive a regular high school diploma by meeting regular graduation requirements by age 21, they may be counted as regular graduates in an extended cohort graduation rate. Please see page 5 for more information on Extended Graduation Rate.

May a GED, alternative diploma, or certificate of attendance be counted as a regular high school diploma?

No. Alternative graduation credentials that are not fully aligned with a State’s academic content standards may not be counted as a regular high school diploma for the purpose of calculating the four-year or extended-year graduation rate. Thus, students who graduate with a credential other than a regular high school diploma, such as a GED, modified diploma, or certificate of attendance, **may not be included in the numerator, but must be included in the denominator of the four-year and extended-year graduation rate.**

Idaho does not use alternative diplomas or certificates of completion.

What is the difference between a non-graduate and a drop out?

Any student who does not graduate with a regular high school diploma that is fully aligned with Idaho’s academic content standards, including a regular high school diploma through an IEP or a GED credential, is a non-graduate for cohort graduation rate calculation purposes, per federal guidance. A non-graduate may remain in school and graduate with a regular high school diploma that is fully aligned with Idaho’s academic content standards at a later date. A drop out is a student who dropped out of school during their four-year cohort and did not return to school.

Another reason for why a student is determined a non-graduate may be a lack of documentation during the cohort graduation rate appeals window. Even if a student exits the public school system for any of a multitude of reasons (home school, out of state, out of country, etc.), the student may not be transferred out of a cohort without documentation affirming that the student continued education elsewhere that culminates in the award of a regular high school diploma, or by failure to appeal the status of the student. Please refer to pages 7-9 for more information on Transfer and Documentation.

Dropouts are non-graduates, but non-graduates are not necessarily dropouts.

Section 4: Goal and Annual Targets

Must a State establish a graduation rate goal and annual targets?

Yes. Under 34 C.F.R. §200.19(b)(3), a State must set (a) a single graduation rate goal that represents the rate the State expects all high schools in the State to meet, and (b) annual graduation rate targets that reflect continuous and substantial improvement from the prior year toward meeting or exceeding the State's graduation rate goal.

The 2008 Title I regulations require States to submit to the Department, for peer review, their graduation rate goal and targets (34 C.F.R. §200.19(b)(6)(i)(C)). States must provide an explanation of how the State's graduation rate goal represents the rate the State expects all high schools in the State to meet and how the State's annual targets demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the State's goal (34 C.F.R. §200.19(b)(6)(i)(D)). In addition, States also must submit the graduation rate for the most recent school year of the high school at the 10th percentile, the 50th percentile, and the 90th percentile in the State, ranked in terms of graduation rate (34 C.F.R. §200.19(b)(6)(i)(E)). Such information will provide the Department and the public with a better understanding of how States are doing in graduating students on time with a regular diploma, as well as context to evaluate the State's goal and targets.

Must a State set the same graduation rate goal for all high schools?

Yes. As required in 34 C.F.R. §200.19(b)(3)(i)(A), each State must set a single graduation rate goal that represents the graduation rate it expects all high schools in the State to meet. Moreover, if a State chooses to implement an extended-year graduation rate, the goal for this rate must be the same as the rate for the four-year graduation rate.

In addition to establishing a graduation rate goal, must a State establish annual graduation rate targets?

Yes. A State must establish annual graduation rate targets that reflect continuous and substantial improvement from the prior year toward meeting or exceeding the State's graduation rate goal (34 C.F.R. §200.19(b)(3)(i)(B)). High schools and LEAs may meet the other academic indicator (i.e., graduation rate) by either meeting (or exceeding) the State's goal or meeting (or exceeding) the annual graduation rate targets.

Idaho's current graduation rate goal is 90%. Idaho is currently working to set graduation targets. For additional information, please see Idaho's ESEA Waiver at, <http://www.sde.idaho.gov/site/esea/>.

Section 5: Reporting

When must States and LEAs first report the four-year graduation rate disaggregated by subgroups? For which subgroups must the data be disaggregated?

Beginning with report cards providing assessment results for the 2010-2011 school year, States and LEAs must report the four-year graduation rate in the aggregate and disaggregated by subgroups. The required subgroups are those specified in 34 C.F.R. §200.13(b)(7)(ii): economically disadvantaged students, students from major racial and ethnic groups, students with disabilities, and LEP students. States and LEAs are not required to disaggregate graduation rate data by migrant status or gender for the purpose of reporting graduation rates; see below. A State's desire to lag data to include summer graduates or to use an extended-year graduation rate in AYP determinations is not a sufficient reason to extend the 2010-2011 deadline for reporting the four-year graduation rate.

The list of disaggregated groups in section 1111(h)(1)(C)(i) of the ESEA, which includes gender and migrant status in addition to the subgroups in §200.13(b)(7)(ii), pertains to reporting disaggregated achievement results on a State's academic assessments. Section 1111(h)(C)(vi) of the ESEA, which requires reporting graduation rates for secondary school students, contains no similar list of disaggregation categories. Accordingly, the Department has taken its cue from section 1111(b)(2)(C)(v)(II) of the ESEA and §200.13(b)(7)(ii), which list the subgroups for which a State must disaggregate data for AYP purposes. It is these categories that a State uses to calculate "safe harbor" and that these regulations now require for disaggregating AYP results. Therefore, these regulations require reporting of disaggregated graduation rates only by the categories that are used for other AYP purposes, because graduation rate data will already be disaggregated by those categories.

For report cards providing assessment results for the 2008-2009 and 2009-2010 school years, a State and its LEAs must report the graduation rate, in the aggregate and disaggregated by the subgroups listed above, using either the State's transitional graduation rate or the four-year graduation rate.

Idaho was given an extension due to the onset of the state's longitudinal data system. The first school year Idaho is required to report the cohort graduation rate is for the 2013-14 school year.

Where must States and LEAs report graduation rate?

States and LEAs must report graduation rate data, in the aggregate and disaggregated by subgroups, on their annual report cards. In addition, States must submit aggregated and disaggregated graduation rates to EDFacts, the centralized portal through which States submit their education data to the Department (OMB collection 1810-0614). These data will be used to generate the Consolidated State Performance Report information on graduation rates.

Beginning with the 2010-2011 school year, States must report the following data to EDFacts (***Reminder: Idaho begins reporting for the 2013-14 school year:***):

- The four-year graduation rate and the extended-year graduation rate (if any) at the school, LEA, and State levels, in the aggregate and disaggregated by subgroup; and
- The number of students in the numerator and in the denominator of the four-year graduation rate calculation and the extended-year graduation rate calculation (if any).

Must an LEA report a graduation rate for each of its high schools?

Yes. An LEA must report a graduation rate, consistent with the timeline in 34 C.F.R. §200.19(b)(4), in the aggregate and disaggregated by subgroups, for any school with a graduating cohort unless doing so would reveal personally identifiable information (i.e., unless the number of students is below the State's minimum group size for reporting purposes) (34 C.F.R. §200.19(b)(4)(i)).

Idaho's minimum group size for reporting purposes is 25.

May a State and its LEAs include in their annual report cards additional information about graduation rate?

Yes. Under section 1111(h) of the ESEA, a State and its LEAs may include in their annual report cards any other information, in addition to the information required by the statute, they deem appropriate. For example, a State or LEA may include information on the percentage of students who drop out, the percentage of first-time 9th graders who were promoted on time, or the number of students graduating with modified diplomas or alternative credentials. Such information might help parents and members of the public better comprehend the facts and circumstances surrounding the reported graduation rate.

Idaho is currently working towards updating the state's Report Card to provide a more accurate picture of Idaho's completers – based on recommendations from the Idaho Accountability Committee, made up of Idaho district and school personnel. It is our hope to have this out no later than the 2015-2016 school year.

Do the 2008 Title I regulations require States or LEAs to report dropout data on their report cards?

No. Dropout data are not required to be reported on State or LEA report cards. However, irrespective of these regulations, **data on the number of students who drop out are collected as part of the Common Core of Data** (a data collection of the Department's National Center for Education Statistics that annually collects fiscal and non-fiscal data about all public schools, LEAs, and States in the United States). In addition, **States must annually report a disaggregated State-level dropout rate as part of their Consolidated State Performance Report**. The Department does not anticipate additional reporting requirements regarding drop out data at this time.

Appendix A: Summary of Qualifying Appeals & Acceptable Documentation

Qualifying Appeal (Students which can be removed from a high school's or LEA's cohort)	Acceptable Documentation
<p>A student who transfers out and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma – this includes students who transfer to a private school or were removed to be homeschooled.</p>	<ul style="list-style-type: none"> • Student who transfer within Idaho will be identified through ISEE and will be reassigned to the transfer school • A request for student records from the receiving school • Written record of a response from an official in the receiving school or program acknowledging the student's enrollment • With respect to home schooled students, ONLY; official written documentation may include a letter of withdrawal or other written confirmation from the parent or guardian
<p>A student who emigrates to another country</p>	<ul style="list-style-type: none"> • A school or LEA must have written confirmation that a student has emigrated to another country (34 C.F.R. §200.19(b)(1)(ii)(B)), but need not obtain <u>official</u> written documentation. • If a parent informs a school administrator that the family is leaving the country, the school administrator may document this conversation in writing and include it in the student's file.
<p>A student who dies</p>	<ul style="list-style-type: none"> • A letter from a parent or an obituary is sufficient documentation. • <u>Official</u> written documentation of a student's death, such as a death certificate, is not necessary

NOTE: For foreign exchange students who transfer back to their country of origin, appropriate documentation includes a letter from the originating agency and/or student passport.

Appendix B: Under the Consolidated State Performance Report, which students are counted as dropouts? Which students are counted as non-graduates for the 2013-14 school year?

A Student Who:	Dropout?	Non-Graduate 2013-14 SY
Graduated or received some other recognized credential, such as a certificate of attendance or GED.	No	Yes
Only attended summer school in this school district (i.e., was not enrolled during the regular school year).	No	No
Left school without diploma or other certification after passing age up to which the district was required to provide a free, public education.	Yes	Yes
Died.	No	No
Is gone; status is unknown.	Yes	Yes
Moved to another district in this or some other state, not known to be in school.	Yes	Yes
Moved out of the United States, enrollment status not known.	No	Yes; unless appealed with acceptable documentation and approved.
Transferred, enrolled in another public school, a private school, or charter school.	No With proper documentation	Yes; unless appealed with acceptable documentation and approved.
Transferred, enrolled in home schooling.	No	Yes; unless appealed with acceptable documentation and approved.
Transferred, enrolled in early college (baccalaureate or associate's program).	No	Will be counted in appropriate cohort graduation rate.
Is in an institution that is NOT primarily academic (military, possibly Job Corps, corrections, etc.) and offers a secondary education program.	No	Yes
Is in an institution that is NOT primarily academic (military, possibly Job Corps, corrections, etc.) and does not offer a secondary education program.	Yes	Yes
Is NOT in school but known to be planning to enroll late (e.g., extended family vacation, seasonal work).	No	Yes
Is NOT in school but known to be ill, verified as legitimate.	No	Yes
Is NOT in school but known to be ill, NOT verified as legitimate.	Yes	Yes
Is NOT in school but known to be suffering long-term illness and NOT receiving education services (residential drug treatment, severe physical or mental illness).	No	Yes
Is NOT in school but known to be suspended or expelled and their term of suspension or expulsion is NOT yet over.	No	Yes
Is NOT in school but known to be suspended or expelled and their term of suspension or expulsion is over.	Yes	Yes
Is NOT in school but known to be expelled with NO option to return.	Yes	Yes

A Student Who:	Dropout?	Non-Graduate 2013-14 SY
Is NOT in school but known to be expelled and enrolled in another school and/or district.	No With documentation of enrollment in another school	Yes; unless appealed with acceptable documentation and approved.
Is in a nontraditional education setting, such as hospital/homebound instruction, residential special education facility, correctional institution, community or technical college where the program is administrated by an agency that is considered a special school district or extension of a regular school district.	No	Yes
Is in a nontraditional education setting, such as hospital/homebound instruction, residential special education facility, correctional institution, community or technical college where the program is an off-campus offering of regular school district.	No	Yes
Is in a nontraditional education setting, such as hospital/homebound instruction, residential special education facility, correctional institution, community or technical college where the program is classified as adult education that is not approved, administered or tracked by a regular school district.	Yes	Yes